

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

---

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

/s/ Barbara Binis  
Barbara Binis  
REED SMITH  
Three Logan Square, Suite 3100  
1717 Arch Street  
Philadelphia, PA 19103  
215.851.8100 (phone)  
215.851.1420 (fax)  
bbinis@reedsmith.com

/s/ Erik W. Legg  
Erik W. Legg (WVSB 7738)  
FARRELL, WHITE & LEGG PLLC  
P.O. Box 6457  
Huntington, WV 25772-6457  
304.522.9100 (phone)  
304.522.9162 (fax)  
ewl@farrell3.com

*Attorneys for Defendant American Medical Systems, Inc.*

/s/ Clayton A. Clark

Clayton A. Clark

CLARK, LOVE & HUTSON

440 Louisiana Street

Suite 1600

Houston, TX 77002

713.757.1400 (phone)

713.759.1217 (fax)

*Attorney for Plaintiffs on Exhibit A*

Dated: January 22, 2016

**EXHIBIT A – CLARK, LOVE & HUTSON**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-cv-06342	Rosalind Breaux, Daniel Breaux v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:12-cv-09390	Patsy McCann-Devivo, Paul Devivo v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:12-cv-09407	Artie Marcum v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:13-cv-02893	Leslie M. Williams v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-01134	Toni K. Fontaine v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-02131	Elizabeth Ramos v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-02234	Jacqueline A. Sharp v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-06684	Janice A. Sheehan, Robert J. Sheehan v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-06688	Michelle Zepeda v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-08065	Desiree DeVille v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-08069	Marian S. Rader v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-08577	Rebecca F. Alexander v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-08601	Georgerie A. Stackhouse v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-cv-09597	Judith Joy Raddigan v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc., Boston Scientific Corporation

**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis  
Barbara R. Binis